

January 23, 2026

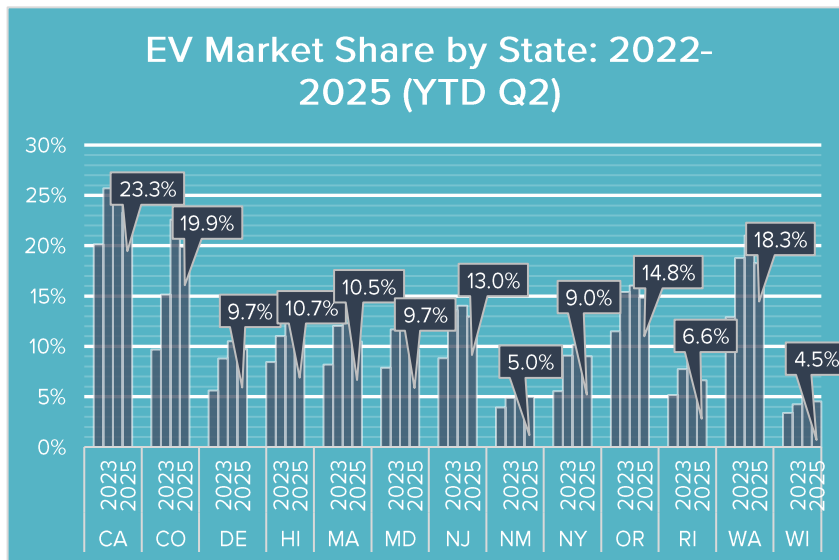
Casey Katims
Affordable Clean Cars Coalition
United States Climate Alliance
United Nations Foundation
320 East 43rd Street, 3rd Floor
New York, NY 10017

Dear Mr. Katims:

The Alliance for Automotive Innovation (“Auto Innovators”) appreciates the Affordable Clean Cars Coalition’s¹ commitment to advance cleaner and more affordable vehicles.

Auto Innovators represents the full auto industry value chain, including the manufacturers producing most vehicles sold in the U.S., equipment suppliers, battery producers, semiconductor makers, technology companies, and autonomous vehicle developers. Our mission is to work with policymakers to realize a cleaner, safer, and smarter transportation future and to ensure a healthy and competitive auto industry that supports U.S. economic and national security. Representing over 5 percent of the country’s GDP, responsible for supporting nearly 11 million jobs, and driving \$1.5 trillion in annual economic activity, the automotive industry is the nation’s largest manufacturing sector².

Transitioning to cleaner and more affordable vehicles requires ongoing collaboration between multiple stakeholders and government. As shown in the graph below, the pace of EV sales has slowed from mid-2023 to mid-2025:



¹ The U.S. Climate Alliance launched the Affordable Clean Cars Coalition, which consists of 13 member states – CA, CO, DE, HI, MD, MA, NJ, NM, NY, OR, RI, WA, and WI (<https://usclimatealliance.org/member-support/affordable-clean-cars-coalition/>)

² Alliance for Automotive Innovation. (n.d.). Resources and insights. <https://www.autosinnovate.org/resources/insights>

The slowdown in EVs’ growth rate has occurred despite consumers having access to over 140 models³ at a wide range of price points and the previously available federal EV tax credit. In fact, manufacturers today offer over 10 EVs in the popular crossover segment alone. However, EVs sit on dealer lots approximately 1.5 to 2 times longer than internal combustion engine (ICE) vehicles at a length of 70 days or more⁴. This data indicates that additional factors are influencing consumers’ purchasing decisions.

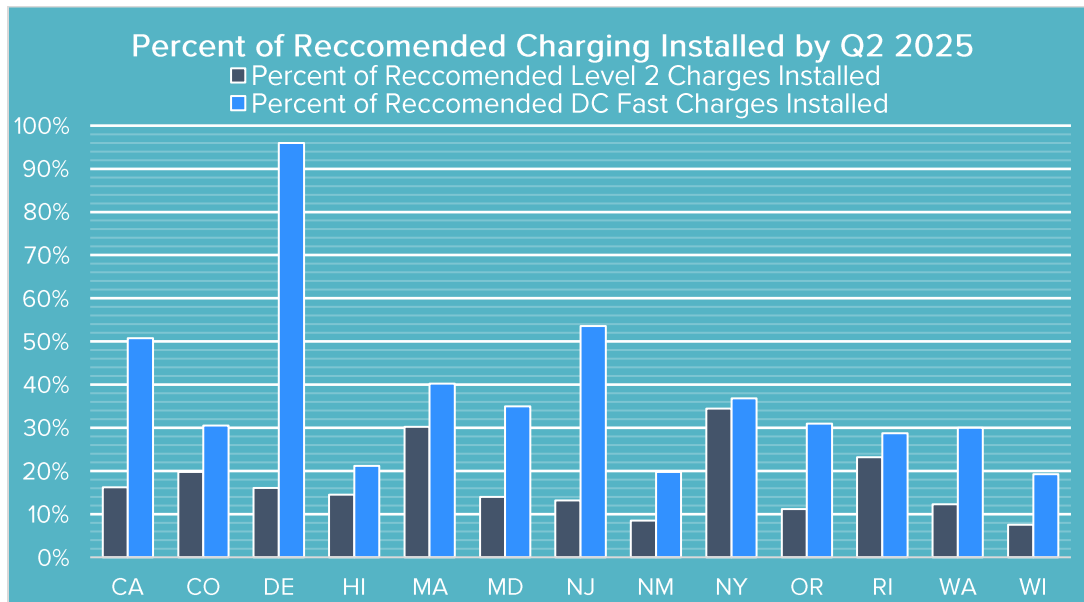
Continuing this transition requires government commitment to the following policies and programs, developed in collaboration with industry:

- Improving the availability and reliability of public charging infrastructure
- Creating cost parity between EVs and ICE vehicles with incentives
- Adopting vehicle-grid integration policies
- Continuing consumer education and outreach
- Supporting a market-based approach to EV battery end-of-life management

Public Charging Infrastructure Availability and Reliability

Public charging infrastructure continues to lag EV adoption. Unfortunately, the rollout of public EV charging does not meet customers’ needs today and falls vastly short of the charging infrastructure required to support increased transportation electrification.

The National Renewable Energy Laboratory (NREL) analyzed the EV charging infrastructure needs for every state to support total EVs in operation, assuming 50% EV sales in 2030⁵. In that analysis, NREL identified the ratio of EVs to publicly available charging. As is shown in the graph below, there is a long way to go to meet the necessary charging infrastructure to support increased electrification.



³ Veloz California EV Market Report. <https://www.veloz.org/ev-market-report/>

⁴ Bell, Sebastien. *EVs Pile Up While Hybrids Fly Off Dealer Lots*. Carscoops. April 2024. [https://www.carscoops.com/2024/04/evs-spend-a-long-time-on-dealer-lots-while-hybrids-fly-out-of-showrooms/#:~:text=Among%20the%20%20slowest%2Dselling,Genesis%20GV60%20\(91.1%20days\).](https://www.carscoops.com/2024/04/evs-spend-a-long-time-on-dealer-lots-while-hybrids-fly-out-of-showrooms/#:~:text=Among%20the%20%20slowest%2Dselling,Genesis%20GV60%20(91.1%20days).)

⁵ <https://www.nrel.gov/docs/fy23osti/85654.pdf>

Most states shown in this graph have deployed less than half of the DCFC recommended, with level 2 deployment even lower; Plug-In America's (PIA) 2025 Driver Survey shows that nearly 36 percent of respondents were concerned about charger availability when purchasing an EV⁶. Nearly 35% were concerned about charger reliability, which was a 3 percent increase from the 2024 survey⁷. Our members hear these concerns directly from prospective EV consumers. Lack of available and reliable charging infrastructure is well understood to massively inhibit EV deployment.

EV Cost Parity

Cost nonetheless remains an important consideration for consumers when considering EVs. Whether due to concerns about vehicle cost, perceptions about the availability and reliability of infrastructure, or lack of familiarity with the technology, many drivers need encouragement to consider an EV. Financial incentives serve as a critical cue to consumers to that end; inversely, when these incentives are no longer available, the market responds negatively. As evidenced by the federal EV tax credit's expiration in September, nationwide new and used EV sales decreased in October to 74,835 and 31,610 units respectively⁸, which is the lowest number of monthly new EV sales and second lowest number of monthly used EV sales so far this year.

The loss of the tax credit has exacerbated existing affordability issues - average EV prices remain higher than ICE vehicles. According to Cox Automotive, the average transaction price (ATP) of a new EV was \$59,125 in October, approximately \$9,300 higher than the ATP for an internal combustion engine (ICE) vehicle⁹. For a used EV, the October ATP was \$37,538, approximately \$3,500 more than a used ICE vehicle¹⁰.

This comes at a time when cost is very much on the minds of EV shoppers. PIA's 2024 Annual Driver Survey indicates that 51.9 percent of respondents were concerned about the price of an EV at the time of purchase or lease¹¹; in 2025, that number decreased to 31 percent¹². While this is a positive development in consumer trends, 31 percent is still substantial. 63.2 percent of the 2025 survey respondents also used the federal EV tax credit.

We have seen time and time again that states with purchase and lease incentives, along with other complimentary policies, have increased EV sales. We recommend that states within the Affordable Clean Cars Coalition implement incentives that can help narrow the current cost gap and we would be happy to support these efforts within the states.

Vehicle-Grid Integration Policies

EV rates and driver-centered managed charging programs enabled by telematics are key to realizing the potential economic and environmental benefits of EV charging. Well-designed residential tariffs and programs deliver cost-based incentives to use the grid efficiently, share savings with participating EV drivers, and do not compromise their mobility.

⁶ Plug In America. (2025). *EV Driver Survey*. Retrieved from <https://pluginamerica.org/wp-content/uploads/2025/06/2025-EV-Driver-Annual-Survey-Report-1.pdf>. Page 12.

⁷ *Id.*

⁸ Valdez Streaty, S. (2025, November 17). *EV Market Monitor – October 2025*. Cox Automotive Inc. <https://www.coxautoinc.com/insights-hub/ev-market-monitor-october-2025/>

⁹ *Id.*

¹⁰ *Id.*

¹¹ Plug In America. (2025). *EV Driver Survey*. Retrieved from <https://pluginamerica.org/wp-content/uploads/2025/06/2025-EV-Driver-Annual-Survey-Report-1.pdf>. Page 18.

¹² *Id.*

Today, most new light-duty vehicles are equipped with a host of sensors and microprocessors, Wi-Fi, and - in some cases - GPS capability. Telematics-based systems can monitor the rate of charge (kW) and total energy dispensed (kWh) in a charging session. For over 25 years, automakers have used telematics systems to offer optional features such as navigation, remote diagnostics, and roadside assistance. Examples include GM's OnStar®, Ford's SYNC®, and BMW's ConnectedDrive® systems.

Telematics-based managed charging programs integrate vehicle and utility data to optimize the timing of charging, thereby enhancing the value of an EV as a grid resource. Utility rate tariffs and program guidelines inform charging schedules set via a smart phone app that does not require a Wi-Fi network connection. By factoring the state of charge into the optimization algorithm, telematics-based managed charging systems can determine how long it will take to replenish the battery and therefore how much latitude there is to modulate charging to shift load and provide grid services.

Consumer Education and Outreach

Consumer education and outreach programs can offer hands-on experiences—such as "Ride-and-Drive" events—that demystify EV technology and increase consumers' familiarity. Studies have shown that participants are significantly more likely to consider purchasing an EV after experiencing its performance firsthand. Beyond basic awareness, outreach initiatives provide essential education on available rebates, range, and the total cost of ownership so that consumers better understand performance and long-term savings in fuel and maintenance. Continued local and state-led outreach remains critical.

EV Battery End-of-Life Management

EV batteries contain valuable minerals that can be reused for future battery production; Auto Innovators' members have already executed partnerships with leading battery recycling companies to properly recover these minerals at a battery's end-of-life. Our members are also pursuing a pilot program to orchestrate proper battery collection and transport to these recycling facilities. Automakers have spent significant time and resources building these partnerships; policies should not reinvent the wheel and instead build on these investments. Doing so will simultaneously support broader affordability goals by minimizing duplicative costs.

In closing, Auto Innovators appreciates the Clean Cars Coalition's commitment to expanded vehicle electrification and the actions necessary to achieve that goal. We look forward to working together with you and the states to find ways to achieve your electrification goals and consider additional actions to accelerate EV adoption in the states. We welcome the opportunity to discuss this further with you and your members.

Sincerely,

Cory Bullis
Director, Energy & Environment Policy
Alliance for Automotive Innovation